

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA, )  
v. )  
ELLIOT W. DOXER, )  
Defendant. )  
No. 11-cr-10268-DJC

**ASSENTED TO MOTION TO MODIFY CONDITIONS OF RELEASE**

The Defendant, Elliot Doxer (“Doxer”), requests that the Court modify his conditions of release to allow his wife, Revital Doxer (“Revital”), to retrieve her expiring passport from Pretrial Services so that Revital may apply for a renewal. As grounds therefor, Doxer states that:

1. One of Doxer's conditions of release included the surrender of Revital's United States passport. This condition was set with the understanding that the passport would be returned if Revital's mother, who has a history of poor health and lives in Israel, became ill.

2. The Court recently allowed Doxer's motion to allow Revital to retrieve her passport with the condition that Revital return the passport to Pretrial Services on the first business day following her return from Israel. Revital has since returned from Israel and returned her passport to Pretrial Services as directed.

3. Revital's passport, however, expired on October 10, 2011. In order to renew her passport, Revital will be required to send the expired passport along with her renewal application. Timely renewal of her passport will prevent any unnecessary delays in returning to Israel should an emergency situation arise.

4. Doxer requests, therefore, that the Court modify his conditions of release to allow Revital to retrieve her passport from Pretrial Services for renewal purposes.

5. Counsel for the government, Scott Garland, assents to the allowance of this motion.

WHEREFORE, Doxer requests that the Court allow his motion.

ELLIOT DOXER  
By his attorneys,

/s/ Matthew D. Thompson  
Thomas J. Butters  
B.B.O. 068260  
Matthew D. Thompson  
B.B.O. 655225  
Butters Brazilian, LLP  
One Exeter Plaza  
Boston, Massachusetts 02116  
(617) 367-2600  
butters@buttersbrazilian.com  
thompson@buttersbrazilian.com

Dated: October 11, 2011

**CERTIFICATE OF SERVICE**

I hereby certify that the above document was sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this date.

/s/ Matthew D. Thompson  
Matthew D. Thompson